

Records Management Program – Policies & Procedures

DECOMMISSIONING SYSTEMS

If a department is decommissioning a system, several factors need to be reviewed.

First, if the system contains financial information/data, Bob Evans in the tax department needs to be notified before the system is decommissioned. Any data contained on the decommissioned system that has a retention requirement must be retrievable and readable until it has fulfilled its retention requirement. The data does not have to be in the same format as it was on the decommissioning system; however, none of the data may be altered or changed. If the data is in a database format, the database may be saved in a flat file format, so that it may be read on any system. Documentation of the data conversion should be created to prove that it was only converted, and that the value or significance of the data had not been changed.

If data contained on a system can only be read with a particular program or hardware, the hardware or program must be retained for the life of the system, or until the retention requirement for the data has been reached.

It is not mandatory to convert data from the old system to the new system. The only requirement is that data can be found, retrieved and read in a timely manner.

An application or HLQ with data on the mainframe does not need to worry about retention of their records. Even if the HLQ is being decommissioned, the mainframe will maintain the data for its entire retention period. (See Records Retention Initiative (RRI) section.)

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Records Management Program – Policies & Procedures**ACQUISITIONS, MERGERS & JOINT VENTURES**

When MCI acquires or merges with another company, it is RIM's responsibility to bring the new company into compliance with the retention program. The first thing that should be done is to find out if the acquired company had a records retention program. Next, RIM needs to find out where all the financial and human resources records are located. If in storage through a vendor not utilized by MCI, RIM needs to assist in the transfer of the records to one of our vendors and then inventory the contents of each box. For both on-site records and stored records, RIM needs to ascertain what retention period, if any, was being utilized. All personnel records/human resource records need to be shipped to the HR Fileroom. Finally, familiarize each employee of the new company with the requirements of the records retention program.

If MCI buys into another company as a joint venture, and if MCI is the minority holder, we have absolutely no obligation or responsibility for the joint venture's records. However, in the past, MCI has offered their expertise in records retention to the other company (i.e., Avantel). We have given advice, but we do not participate in the retention of their records.

An Acquisition Guide was developed to issue to new acquisition personnel until they have access to RIM's website. A Questionnaire was also developed to ascertain storage practices and needs of the acquisition. Both the Guide and the Questionnaire are in Appendix K.

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RIM COMPLIANCE AUDIT PROGRAM

The RIM Compliance Audit Program is a continuous process. The purpose of the audit program is to ensure that all departments are complying with the records management procedures and retention program. One objective of the audit is to educate each department regarding the Records Management Program and their individual responsibilities.

Department are selected randomly. The auditor needs to perform background research on the department, such as what types of records the department has, if they have off-site storage, etc. An e-mail, along with a questionnaire (Appendix L) is sent to the department requesting a meeting. The questionnaire is reviewed, follow-up questions are asked and answered, and then the department is accessed for compliance.

Factors in compliance:

Is the department retaining their records in accordance with the RRS?

Is the department shredding confidential records? Does the department understand what is considered confidential?

Is the department storing their records off-site properly? Can records be retrieved in a timely and efficient manner?

Is the department destroying on-site records that have surpassed their retention?

Is the department backing-up their PCs? Does the department retain e-mail when appropriate?

Does your department enter journal entries into the ledger system? If so, what do you do with the original documentation?

There are other criteria for passing the audit; however, the most important criteria is whether or not the department is retaining records they are responsible for, and retaining them for the right period of time.

Once the department has been audited, a memorandum is created stating the results and recommendations. The memorandum should be sent to the Interviewee with a copy going to their manager. If the department passes the audit, a certificate (Appendix L) is sent along with the memorandum. Departments that pass the audit are audited every five years. If a department fails the audit, the memorandum will contain reasons for noncompliance, recommendations to become compliant, and a re-audit date.

Departments that fail are audited again after one year. See Appendix L, for a sample of a department who was not compliant with the records management program.

On a quarterly basis, a status report of the compliance audits is given to the Manager and Sr. Manager of the department. See Appendix L, for an example of the status report.

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RECORDS RETENTION INITIATIVE (RRI)

The Records Retention Initiative, or RRI, was a corporate-wide project to identify, and retain electronic data critical to legacy-MCI's legal and fiduciary requirements. The project was initiated to support managing the risk associated with electronic data retention.

RIM was the major driver in the creation of the RRI. The RRI started in 1997 after RIM found that some tape data was not being retained long enough. It was determined by the Director of Finance, VP of Finance/Controller, and Director of Production Operations that a task force was necessary to review every mainframe system application high-level qualifier (HLQ) within MCI, and certify it for compliance with retention policies. The project was owned and driven by MCI's Service Operation's Production Operations Department located in Colorado Springs. It is now handled and maintained by EDS.

The RRI created a purpose and mission statement as follows:

Purpose:

The purpose of the RRI was to implement and explain the standards and management of Direct Access Storage Devices (DASD) and of magnetic tape resources on the mainframe.

Mission Statement:

The RRI will implement a process to ensure MCI's critical data is retained in accordance with government regulations and MCI Corporate Policy.

The RRI main objective has been achieved. As of now, the RRI handles new high level qualifiers (HLQs) and HLQs that are changing their process. HLQ is a two alpha letters identifying the application. You can view the standards by going to
<http://eashome.mcit.com/innerstand/>

You will find specific information regarding Critical Data Set Naming and Retention located under 1.2.3.13 of the standards. This will show a list of the categories and their retention requirements as dictated by Records Management.

Records Management's role has been to determine if a HLQ has a retention requirement and, if so, what category they fall under within the standards. Records Management does not assign data set names or give direction in how it is to be done. All instructions are to be given by the RRI group within EDS. A listing of HLQs and their required retention is in Appendix M.

The RRI Committee includes:

Project Lead: Carla Adams, EDS, Vnet 622-5556

Project Coordinator: Trishell Glasco, EDS, Vnet 622-3133

Records and Retention Advisor: Records Management

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INTERNAL E-MAIL POLICY

All electronic communication systems and all communication and information transmitted by, received from, or stored in these systems are the property of the Company, and as such are to be used solely for job-related purposes.

Offensive messages, such as those including racial slurs, sexual innuendo or any other type of inappropriate language, are strictly prohibited. Additionally, the e-mail network is not to be used to solicit for outside business ventures or political or religious causes.

Employees should not use this system for personal purposes. Further, employees are not permitted to use a code, access a file, or retrieve any stored communication unless authorized to do so or unless they have received prior clearance from an authorized Company representative. No employee may use a pass code that has not been issued to that employee or that is unknown to the Company.

Electronic mail communications are considered to be Company property and are subject to inspection by the Company at any time without prior notice. Employees who violate this policy are subject to disciplinary action, up to and including discharge.

As you know, MCI has in place a mandatory records retention policy developed and monitored by RIM. This policy applies to all MCI entities and establishes retention criteria, which are generally based on the nature or content of a particular document. Because e-mail encompasses the full array of types of communications, the retention period is based on the content of the message in question. Thus, for example, an e-mail message between a MCI employee and a vendor must be retained for the time period specified for vendor correspondence.

Unless otherwise covered by a specific retention requirement, internal e-mail need not be retained beyond its useful life unless it is relevant to ongoing litigation, an enforcement proceeding or an audit. Under such circumstances, you typically will be notified of the obligation to retain until further notice the pertinent hard copy and electronically stored materials.

This policy is intended to supplement, not supersede or contradict, any other e-mail policies in effect at the Company. Those policies are located at the following Intranet websites: <https://teamnet2.mcilink.com/departments/lppgc/techlaw/>

See Appendix N for a copy of LPP's "E-Mail Guidelines."

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RECORDS MANAGEMENT TRAINING

Records Management training is given throughout the company. Typically, training is given when enough individuals have requested it in a particular location and can be given either via Conference Bridge or in person by RIM personnel.

Areas covered in training are:

- What is Records Management?
- What is a record and non-record?
- What are vital records?
- What is a Records Retention Schedule?
- Why can't records be saved forever?
- What is the Records Management Compliance Audit?
- E-Mail issues
- Records Management's web-site

In addition to the areas covered above, two videos are shown during the training. The first video shown is "For the Record". The second video is "The Plugged-In Mailbox; E-Mail Uses and Misuses". Both videos are by Commonwealth Films, Inc. and both are approximately 22 minutes in length.

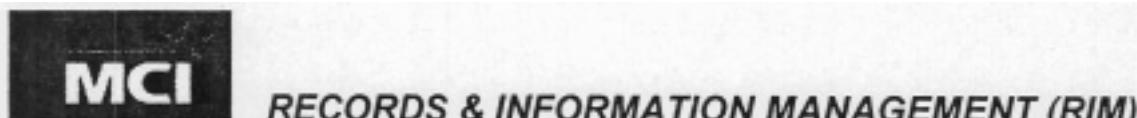
A copy of the training presentation and other records management training information is in Appendix O.

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COMMUNICATION – “NEW EMPLOYEES”

Once a month RIM receives a list of newly hired employees and sends a communication out to them. A copy of this document is available by request per Christopher Moses;

Christopher.Moses@mci.com

**Welcome New Employee!**

The Records and Information Management group would like to welcome you to MCI. We believe that every new employee can immediately contribute to the success and continuity of our Records Program.

We have outlined the program's objectives and described employee responsibilities in the following overview. Please take a moment to read through this information.

We wish you every success in your new job!

Introduction:

Compliance with MCI's Records Program is mandatory. As an MCI employee, you are responsible for understanding the policy and complying with the program. Records management is an ongoing effort and a regular part of each employee's job.

Since the Records Program is mandatory for all employees, and all levels of management are held accountable for their department's compliance, Records and Information Management (RIM) would like to take this opportunity to familiarize you with the records guidelines. The information contained within this document will help you learn about records and their importance to MCI as well as your responsibilities for records retention.

Objectives of MCI's Records Program:

- Ensures that all local, state, federal and operational record-keeping requirements are met.
- Preserves valuable floor space and other data storage space by assigning retention period limits to records.
- Promotes the availability of information by providing required retention periods.
- Ensures orderly and efficient records life-cycle management.

What is a Record?

- A record is any recorded information created, received, used or distributed by MCI in the course of conducting business, regardless of media or other specific characteristics.
- A record may be in the form of paper, microfilm, computer tape, floppy disk, CD-ROM, microfiche, videotape, optical disks, email, PC hard drive, local area networks or other unique forms.
- Regardless of the form, only the recorded information is the actual record. The medium is used as a container for the record and therefore has no bearing on records retention requirements.
- **RIM requires that all MCI records be maintained in a manner that makes them easily and cost-effectively retrievable and readable throughout the life-cycle of the record.**

What is a Non-Record?

- Any tangible information that does not typically contain data pertaining to or originated by MCI.
- Materials typically used as reference or research tools, including such items as newspapers, periodicals, brochures, internet information and books.
- Unsolicited announcements, invitations or other materials that are not filed as evidence of office or production operations.

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- Preliminary notes that do not represent significant steps in the preparation of record documents.
- Blank forms, file and office supplies.

What is a Vital Record?

- A vital record is a record that is considered to be absolutely essential to the continuation or reconstruction of an organization. Vital records help establish the legal and financial position of MCI, and are critical to preserving the rights of the organization, its employees, customers, and stockholders.
- Departments with vital records must have a disaster recovery program in place. Periodical testing of the program with results documented is required.
- Vital records must be adequately protected from loss due to accident, fire, flood, sabotage, etc.

Record versus Non-Record:

- As defined above, the differences between a record and a non-record are clear. *A record* is required to be retained in accordance with MCI RIM policy and procedures, as it possesses significant administrative and operational value for the company. A *non-record* possesses no significant administrative or operational value to the company, and therefore *has no required retention*.

What is a Records Retention Schedule?

- A Records Retention Schedule (RRS) is a comprehensive listing for all MCI employees to determine time frames for the retention of ALL records created, received, used and distributed by MCI, regardless of media. The RRS is subject-oriented and hierarchical. It groups "like records" first by major function (Primary Classification), and then by type of record (Record Series) within that function.
- All records, regardless of media, (paper, electronic, microfilm, etc.) are the property of MCI and as such are subject to MCI RIM policies. The RRS lists the record types and how long they are required to be kept.
- The RRS is available at <https://teamnet2.mcilink.com/departments/rim/retention/index.html>.

What are the Responsibilities of Employees and Management?

- All employees and all levels of management are required to be familiar with the Records Program and to comply with its policies and procedures.
- All employees are expected to retain records in an orderly manner to facilitate a cost-effective and resource-efficient retrieval process.
- Departments with vital records must have a disaster recovery program in place.
- MCI management is required to periodically review the RRS to determine the retention period for their organization records. If a record series that matches the records within an organization cannot be located, Records and Information Management should be contacted.
- MCI management is required to test their organization's compliance with the corporate Records Program on an annual basis.

Where can I find out more information about MCI's Records Program?

Visit the Records and Information Management website at: (<https://teamnet2.mcilink.com/departments/rim/>) or call Records and Information Management.

Contacts:

- Senior Manager, Audit & Control
 - Brenda Tate
Vnet – 806-3538
brenda.tate@mci.com

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- Manager, Records and Information Management
 - Joyce Moultry
Vnet – 806-3336
joyce.moultry@mci.com
- Facility Closures and Records Recovery
 - Darrell Daniels
Vnet – 806-3378
darrell.daniels@mci.com
- Electronic Records Specialist
 - Michael L. Simms
Vnet – 806-1252
michael.l.simms@mci.com
- Audit and Vital Records
 - James Green
Vnet – 806-3364
james.green@mci.com
- Records Inventory and Special Projects
 - Joe Stephens
Vnet – 806-3401
joe.w.stephens@mci.com
- Paralegal
 - Charles L. McBride
Vnet – 806-3831
charles.mcbride@mci.com
- Offsite Storage and Invoicing
 - Philip Hasselvander
Vnet – 806-3398
philip.h.hasselvander@mci.com
- Offsite Storage and Document Retrieval
 - Chris Moses
Vnet – 806-7117
christopher.moses@mci.com

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OFF-SITE STORAGE INVENTORY DATABASE

An inventory of all off-site storage located at Iron Mountain is available on RIM's website, under "Inventory Queries". This inventory data is submitted by Iron Mountain on a weekly basis.

Currently, storage vendors other than Iron Mountain do not have the capability to FTP their inventory data to MCI TeamNet. Our other vendors could provide this information in a spreadsheet format but this would entail TeamNet's manual involvement to download this information.

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RIM'S WEB-SITE:

Records management policies, procedures and information are located on a RIM's website: <https://teamnet2.mcilink.com/departments/rim/>.

The website contains the following:

Policies & Procedures – all the policies and procedures on the records management program. Also has instructions on "how to" use off-site storage.

Record Retention – MCI's Records Retention Schedule. You can either use the RSS by a search query or in PDF format.

Inventory Queries – query pages to search database of entire off-site storage inventory.

Off-Site Storage Requests – contains all request forms to storage vendors for services. Also contains the MCI Box Inventory Form, the File-Level Inventory form and the Fax Order Form in PDF. A copy of each of these forms is in Appendix?

Points of Contact – names, addresses and telephone number of the RIM staff and all off-site storage vendors.

Vital Records – listing of records that are considered "vital" within the company.

Disaster Recovery – guidance for establishing disaster recovery procedures.

Help – frequently asked questions along with their answers.

Tidbits & Reminders – some basic reminders

infoRM contains the following:

Retrievals or Queries – contains web pages that perform a retrieval or query on financial or corporate functions.

Information – contains web pages that provide information regarding a variety of issues (i.e., a listing of MCI's applications and HLQs, a listing of departments audited under RIM's compliance audit, etc.)

See Appendix P, for screen prints of major web pages within the website.

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MCI RESOURCES

Law & Public Policy (LPP)

<http://lpp.MCIt.com>

LPP is essential in assisting records management with legal questions that might arise. LPP also authorizes destruction of records in off-site storage.

Litigation, under Anastasia Kelly, Executive VP & General Counsel, provides commercial, employment and regulatory litigation services for MCI and its affiliates. The department also handles all requests for information and documents from civil litigants and law enforcement authorities. Finally, it provides advice and educational presentations designed to protect MCI from litigation.

Records & Information Management's contact with LPP is Jeff Jacobs. The destruction review listing should be sent as an e-mail attachment marked confidential to Jeff Jacobs.

Jeff Jacobs
1133 19th Street, NW
Washington, DC 20036
Phone: Vnet 222-6605
Fax: Vnet 222-6072
E-Mail: Jeff.Jacobs@mci.com

Tax Department

<http://nml.MCIt.com/tax/tax.htm>

Tax is essential in assisting Records Management in many financial recordkeeping requirements, whether it's IRS or State requirements.

Any issues regarding tax requirements should be addressed with Jon Thoren, whether the issue is federal or state. If he does not handle your question or matter, he will direct you to the correct contact.

Jon Thoren
Income Tax Audits & Appeals
22001 Loudoun Country Parkway
Ashburn, Virginia 20147
Phone: Vnet 806-5280 or 1-703-886-5280
E-Mail: jon.thoren@mci.com

Any issues regarding tax requirements of financial systems or decommissioning of financial systems should be addressed with Bob Evans.

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Robert J. Evans
Senior Manager, Tax Systems
22001 Loudoun Country Parkway
Ashburn, Virginia 20147
Phone: Vnet 806-4949 or 703-886-4949
E-mail: robert.j.evans@mci.com

Resource Management

Resource Management is responsible for tape storage of all mainframe applications data. RIM works closely with this department for system certification under the RRI, as well as during the IRS Compliance Audit Program.

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1424/117
2424 Garden of the Gods Road
Colorado Springs, CO 80919
Phone:
E-mail:

Production Support

Production Support is a major contributed to the RRI and the certification of HLQs.

Mark Mancini, Sr. Manager / IT Provisioning
2424 Garden of the Gods Road
Colorado Springs, CO 80919
Vnet: 622-6475
E-mail: mark.s.mancini@mci.com

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OTHER RIM RESOURCES

There are many resources that can assist with records management issues.

Association of Records Managers and Administrators, Inc. (ARMA)

13725 W. 109th Street, Suite 101

Lenexa, KS 66215

Phone: 1-800-422-2762

Fax: 913-341-3742

E-mail: hq@arma.org

<http://www.arma.org/hq>

ARMA International - the Association of Records Managers and Administrators, Inc. - is a not-for-profit professional association of over 10,000 records and information management professionals in the United States, Canada, and around the world.

The Mission of ARMA International is:

1. To advance records and information management as a discipline and a profession.
2. To organize and promote programs of research, education, training, and networking in the profession of records and information management.
3. To support the enhancement of professionalism of the members of ARMA International.
4. To promote cooperative endeavors with related professional groups.

It is highly recommended that you become a member of ARMA.

Association for Information and Image Management International (AIIM)

1100 Wayne Avenue, Suite 1100

Silver Spring, MD 20910

Phone: 301-587-8202

Fax: 301-587-2711

Email: aiim@aiim.org

<http://www.aiim.org>

AIIM is an international organization made up of people in the information management community. It is the meeting place users, vendors and solution providers come together to solve problems, present ideas, provide solutions and relationships.

Joining AIIM is not necessary; however, if emphasis continues to grow in information technology, then it would be advisable to become a member.

Records Management Listserv

The records management listserv is a great source for information and a great place to meet others within the records management field. The listserv is a place to post questions and keep in touch with what is happening throughout the world.

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To join the listserv send an e-mail to: listserv@listserv.syr.edu In the body of the e-mail type the word 'subscribe'. Do not add anything else. You will get an e-mail in return asking you to confirm your subscription, along with directions on how to use the listserv

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APPENDIX A

Record Retention Schedule (RRS)

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APPENDIX B

“Records Needed By LPP For Possible Litigations”

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900 monthly settlement records	C + 10
900 records previously designated to Records Management	C + 10
A/P bills and MCI payment	CY + 7
Account receivable and payment	CY + 7
Advertisements and marketing material considered (approved/disapproved) by MCI	S + 3
Affirmative Action Plans	S + 3
Agreement for tariff services	C + 3
Alternate Channels agent records and reports	CY + 3
ANI call detail reports for 900 services	CY + 7
ANI caller credit detail reports for 900 services	CY + 7
Annoyance Call Bureau Records	CY + 3
Applicant flow logs	CY + 3
Arbitration case files	C + 10
Benefits plan documentation (e.g. SPDs)	S + 6
Billing records of local customers	CY + 7
Branch customer file records	C + 3
Business Analysis records regarding customer contract support	CY + 3
Call detail records	CY + 7
Carrier Invoice records for lease-line services and services in support of MCI's Real Time	CY + 7
Collector's notes	CY + 7
Commission information internal/external	CY + 7
Commissions data	CY + 7
Commissions plans	S + 3
Compensation Manuals	S + 3
Contracts (any and all) with drafts and correspondence relating to contract negotiations	C + 15
Copies of checks issued by Accounts Payable.	CY + 7
Copyright registrations	T + 3
Correspondence between MCI and the government related to government contracts	C + 15
Correspondence to and from local exchange carriers.	CY + 3
Credit Write-offs	CY + 7
Credit and Collections Records including phone contacts made with debtor/customer	C + 3
Customer activity documents, correspondence and communications	CY + 3
Customer complaints and MCI responses	C + 15
Customer contract records	C + 15
Customer credits and adjustments	CY + 7
Customer data - OCIS notes (online customer note screens)	CY + 3
Customer files maintained by the branch sales units	T + 3
Customer invoices and payments	CY + 7
Customer service records	CY + 3
Documents regarding how account is established.	CY + 3

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Documents to prove lost profits damages (e.g., sales, marketing and accounting-type documents -- these can constitute summary documents)	CY + 3
E-mail of departing/reassigned employees	T + 3
EEO-1 Reports; FCC-395 Report; Vets-100 Report	C + 3
Employee benefits files	T + 30
Employee Handbooks	S + 3
Employee Monitoring Consent forms	CY + 3
Employee Survey results	AR + 3
Employment applications	CY + 3
Equipment Receipt Forms	CY + 3
Field Engineer fiber-cut repair records re: equipment replacement costs	CY + 3
Field Engineer time records for fiber-cut repairs	CY + 7
Financial documents which support MCI government contracts bids, including the business case and documents prepared by Business Development	S + 10
General statistical records for customer service calls, i.e. # of calls received on daily basis	CY + 3
HR policies and practices	S + 3
HR Open Door/Investigatory Files	T + 3
Immigration Documentation (I-9s)	T + 3
Inactive account fees	CY + 7
Installation, capacity or port availability records	C + 3
Internet Postmaster records	CY + 3
Internet related records re customer complaints on spamming or spoofing	CY + 3
IP licenses and assignments	T + 3
Letter of Agency/Authorization records	CY + 5
Litigation case files	C + 10
Manager/Supervisor desk/working employee files	T + 30
Marketing and Sales Materials	S + 3
Mass Market agent records and reports	CY + 3
Material from 'Road Shows' in which MCI executives participate	S + 3
MCI Mail records relating to complaints about spamming and spoofing	CY + 3
MCI Marketing materials	S + 3
MCI's compliance with state abandoned property laws	CY + 10
Monitoring acknowledgement forms	CY + 3
NETCAP records	CY + 3
Network reliability records, including records regarding outages and fiber-cuts	C + 1
Non-publication/non-listing records (local)	S + 3
OCIS records	CY + 3
Options documentation	CY + 3
Order entry records	CY + 3
Organizational charts or other staffing information	S + 1
Original patents	T + 20
Paid commission sales rep. files	CY + 10

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Payroll	CY + 10
Payroll Deduction Authorization	CY + 10
Performance plans	S + 1
Performance Reviews	T + 30
Personnel Action Forms relating to terminations	T + 30
Personnel files (complete)	T + 30
Policies, procedures, and business plans related to local markets	S + 1
Presentations to customers	S + 3
Prime and subcontract agreements	C + 15
Procurement records	C + 15
Product descriptions and B/D requirements (i.e. B/D Playbooks)	S + 3
Product Fulfillment packages	S + 3
Promotional Materials	S + 3
Prosecution histories relating to patents, trademarks and copyrights	T + 20
Provisioning records for loops, platforms, transport, etc.	S + 3
Purchase orders	C + 15
Real estate administration and contract records	C + 15
Records reflecting investigations performed by other MCI groups (e.g. HR)	C + 3
Records related to capacity issues or inability to provide service in a timely basis (correspondence, memos, e-mails)	CY + 3
Records related to local service trials (operational trials as well as alpha and beta testing).	CY + 5
Records showing restoration efforts	C + 1
Relocation assistance files	C + 5
Reports related to performance on government contracts	CY + 1
Resolution of billing disputes	C + 1
Resumex Documentation	CY + 3
Sales award program materials and results	S + 1
Sales commissions and bonuses	CY + 7
Sales contests	C + 3
Sales Representatives commission files	T + 1
Service order records from customers and to incumbent LEC	CY + 3
Signed agreements such as the Non-disclosure/Confidentiality Agreement	C + 15
Signed confidentiality and non-compete agreements	C + 15
Suppression records	C + 3
Switch records (processed & unprocessed), i.e. rated records and non-rated records	CY + 3
T&E documentation	CY + 7
Tariff provisions	S + 1
Telemarketing records	CY + 3
Telemarketing training materials	S + 3
Telemarketing scripts for basic service and various products	S + 3
Trademark registrations	T + 3
Trouble tickets	CY + 3
Unapplied Cash	CY + 10
Wage & Bonus documentation (Payroll)	CY + 10

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Written employee acknowledgement of receipt thereof	T + 3
Customer Information, such as: customer billing name customer billing address customer phone number account number account status (active/deactive/pending/rejected) detailed billing information summary billing information calling plans language indicator tax status SSN/DOB address changes inter/intra lata indicator telephone number credit card number (if applicable) promo code(s) and history account establishment code install date deactivate date financial history (payment) master history cus code (if applicable) calling card number OCIS notes (this gives a detail of actions performed on any particular account) FCUR FAHT (financial history) LOA's PIC fee(s) lead information (phone number, date sent, date called, term code, SSN, sales city, application/campaign code, contact name, language indicator) payment method	C + 3

CY = calendar year

C = closed, completed or canceled

S = superseded

T = terminated

AR = annual review

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APPENDIX C

RRS Merged Records

APPENDIX D

RRS Electronic Version

**To be provided to storage vendors to download to their system.
An electronic copy is with the electronic version of this
Procedures manual.**

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APPENDIX E

Storage Vendor Statement of Work

and

“MCI Procedures for Vendor Off-Site Records Management and Storage”

EXHIBIT A**STATEMENT OF WORK**

The following Statement of Work sets forth tasks to be performed by Iron Mountain (the Contractor) and performance standards that apply to all MCI locations utilizing Contractor for offsite records storage and management, unless otherwise indicated.

OVERVIEW

Contractor shall provide all labor, equipment and personnel to provide all records management services to MCI including, but not limited to client interface services, records storage, accession, retrieval, refile and destruction services; special projects, documentation / certification of destruction, comprehensive and accurate data entry and support services; and accurate invoicing and reporting.

DEFINITIONS

Records & Information Management ("RIM"): MCI's RIM department is responsible for the overall management of MCI's records management program. All services shall be reviewed, coordinated and approved by this department.

Work: Includes all records management services including but not limited to data support services, records storage, accession, retrieval, refile, destruction, customer education and support services necessary to support all requirements of this SOW.

Carton: Used interchangeably with box and container. Refers to the packaging used to store records..

GENERAL REQUIREMENTS

The following are general requirements for records management services to be provided by the Contractor.

- A. The Contractor will ensure the security of MCI records in accordance with Articles 6, 7, 8 and 11 of this Agreement.
- B. The Contractor will assign to the MCI account, at a minimum: A National Account Service Manager, and at the district level, a District Manager and customer support personnel.
- C. All records storage, accession, retrieval, refile and destruction services shall be in accordance with MCI's Records Retention Schedule ("RRS") which is attached hereto and made a part of this Agreement (see Attachment A).
- D. The Contractor shall not acknowledge nor use, under any circumstances, Record Classification Codes or Record Series (RS) numbers other than those contained in MCI's Record Retention Schedule (RRS). If an RS number is in question RIM should be contacted.

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- E. The Contractor shall only use electronic mail to communicate with MCI sites for the purpose of receiving and acknowledging service requests, unless other communication methods have been approved by RIM in writing.
- F. All communications with MCI end-users will be ‘copied’ (cc) to RIM.
- G. The Contractor’s customer support personnel must be knowledgeable about the MCI’s account. Support personnel will answer questions from local users, receive and initiate orders, communicate with MCI users and make every effort to answer billing, service and operational issues within 24 hours. A Program Manager will be assigned to the MCI account and serve as the primary source of communication and information between RIM, MCI end-users and Iron Mountain support personnel. The Program Manager will respond to MCI issues within 24 hours, if only to acknowledge the issue and discuss necessary follow-on work.
- H. Only the MCI requestor’s name will be used in connection with the service request unless otherwise stated in the special instructions. Default names will not be used.
- I. The Contractor will maintain an in-house box tracking system which captures the following data:

<u>Field</u>	<u>Field Type</u>	<u>Characters</u>
MCI department	alpha numeric	8
Carton Barcode Number	alpha numeric	vendor specific
Reference Number	alpha numeric	
Record series #	alpha numeric	5
From date	date	8
Thru date	date	8
Contents Description	alpha numeric	55
Retention Hold Code	alpha numeric	3
Destruction Review Date	date	8
Service Order Number (SO cartons were received on)	alpha numeric	vendor specific
Order Requestor (MCI submitter)	alpha	20
Service Date (date cartons were received)	date	8

The Contractor will be responsible only for the information as provided by MCI

- J. MCI’s Records Retention Schedule must be incorporated into the Contractor’s database. Destruction dates must be calculated using the RRS data and thru dates.
- K. The Contractor’s personnel should instruct MCI users to contact RIM if they need guidance on utilizing MCI’s Record Management Program.
- L. The MCI Box Inventory Form will be utilized exclusively (see Attachment H). The contractor will direct MCI end-users to RIM for a supply of the Form.

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- M. Inventory forms must accompany all new inventory/records sent to storage. Orders with no accompanying inventory forms will not be accepted for pick up. MCI will review the Inventory Forms prior to placing the pick-up order.

All information will be entered in to the Contractor's system as received on the Inventory Form provided by MCI, to include the Retention Code if completed. (For the "Record Classification Code" field, enter "RS" with the corresponding number entered by the submitter. For example: RS45.)

- N. File-level indexing. All cartons that have been file-level indexed will be accompanied by the MCI Carton / File-Level Inventory Form (see Attachment I) or listing in an acceptable electronic format. A hardcopy of the Inventory Form or listing will be contained in the carton and a duplicate copy will be transmitted to the Contractor electronically. Prior to receipt by the Contractor, each carton will contain a carton barcode number and each file will have assigned a Customer File ID number and a File Description.

Upon receipt, the Contractor must verify the contents of each carton against the accompanying inventory form or listing. Any discrepancies will be referred back to the submitter, copying RIM.

- O. Only RIM personnel, and MCI personnel given authorization by RIM, can permanently withdrawal MCI records. The Contractor's Chicago and Kansas City districts will be provided an authorization list identifying MCI personnel authorized to permanently withdrawal. In all other circumstances, RIM will submit permanent withdrawal orders to the Contractor's Program Manager for routing to the pertinent Contractor district for processing. All permanent withdrawal orders must be received by the Contractor in writing.
- P. The Contractor will provide MCI with an electronic version of their inventory data contained within Contractor's inventory system in an agreed upon format and frequency.
- Q. The Contractor shall exercise disaster recovery procedures as described in Attachment D, of this Agreement.

REPORTING

MCI's requirements with regard to reporting and invoicing for the Contractor's account are as follows:

- A. The following reports will be delivered to MCI as outlined below, in mutually agreed upon formats:
- 1) New box storage activity report (monthly). Due the 15th of each month, reporting on the previous month. Contains: All new storage for that month. This report will be sorted by MCI department.
 - 2) Retrieval / Outcard Report (quarterly). Due April 15th, July 15th, October 15th, and January 15th. Contains: This report lists all retrievals outcarded for more than one day. This report will be sorted by the retriever's name.

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- 3) Inventory Report (annually). Due March 31st or after the annual destruction project is completed. Contains: Full inventory listing. This report will be sorted by Record Classification Code.
 - 4) Candidates for destruction (annually). Due November 15th. Contains: All cartons eligible for destruction as of the end of that calendar year, in accordance with MCI's Record Retention Schedule. This report will be sorted by Record Classification Code.
 - 5) Retention Hold Code (annually). Due June 30th. Contains: Lists all cartons assigned a Retention Hold Code. This report will be sorted by the Retention Hold Code.
- Items 1, 3, 4 & 5 above will contain the information/fields listed under Item I, herein, "General Requirements".
- Item 2, the Retrieval / Outcard Report, will contain MCI department, carton barcode number, carton description, Record Classification Number, name of the MCI requestor, the date of retrieval and the service order number.

B. All reporting and invoicing will be provided to MCI using the exact same cut-off date. That cut off date will be the last business day of the month.

RETRIEVAL / REFILE / NEW STORAGE

MCI checks the departments of all requestors versus the information related to the individual boxes which the requestor has asked to pull; this is to help ensure sensitive material, such as HR records, are kept private. The Contractor shall provide retrieval/refile and storage services at locations as designated and agreed to by MCI and the Contractor. These services include the following specific requirements:

- A. Types of service:
 - "Regular": Retrieval / pickup the next service day.
 - "Same day": Request is received before 10am; delivery will be made that service day. This type of service must be specified by the requestor (otherwise it is a "regular" service request).
 - "Rush": Service provided within two (2) hours of the request (but within regular business hours). This type of service must be specified by the requestor in the submitted service request. The requestor must follow the service request by a telephone call to the Contractor informing them of the submission of the rush order.
- B. If certain Contractor facilities/areas are unable to provide two (2) hour rush service, these facilities/areas must be identified to RIM by the Contractor. With RIM's concurrence, only "Regular" and "Same day" service will be provided in those areas.
- C. Services should be performed throughout the week (Monday-Friday).
- D. Retrieval, refile and new storage requests received by 4:00pm will be serviced on the next scheduled run. Requests received on a Friday will be delivered / picked up on the following Monday.

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- E. Under no circumstances will the Contractor perform nor charge MCI for Rush or After Hour pickups.
- F. Respond to service requests by electronic mail within four (4) hours of receiving the request. Electronic mail is the only acceptable method to be used for service requests. Electronic mail confirmations will be sent for each service request, copying **all** addressees. The confirmations will contain the service order number and the delivery date.
- G. New storage and refiles will be shelved, data entered with information received, and fully processed within 72 hours of receipt.
- H. The Contractor will not retrieve MCI records for any reason other than responding to MCI service requests without written approval from RIM.
- I. If there is to be a delay in delivering records under a service request due to locating / retrieving the requested records, the Contractor will notify the requestor, by phone, prior to delivery of the order. If the requested service will be delayed beyond the normal service schedule (i.e., beyond the next day scheduled delivery), a follow-up email will be sent to the requestor with a copy ('cc') to RIM. Notifications should provide the reason for the delay and expected delivery reschedule. Under no circumstances should notification occur only at the point of delivery.
- J. The Contractor will obtain the signature of the individual receiving MCI records on a delivery.
- K. The Contractor will not, under any circumstances, deliver MCI records to a MCI mailroom, loading dock or similar facility unless a specific exception is authorized in writing by RIM and agreed upon by Contractor.

CONSOLIDATED DATABASE

The consolidated database, maintained by MCI, refers to the merged descriptive and retention information for **all** MCI records stored offsite.

- A. The Contractor will provide consolidated datastrips to MCI in a mutually agreed upon format.
- B. Datastrips, will include all descriptive and retention information (listed in item I, herein, under General Requirements) for all of MCI's boxes in Contractors' system.

THE CONTRACTOR'S DATABASE

The Contractor shall use their computerized inventory control system to manage MCI's records.

- A. Data entry will be performed with 99% accuracy.

An error is defined as: Any miss-keyed data and/or Record Series Number, any transposition, missing digits. Reasonable occurrences of missing punctuation,

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misspellings, inaccurate abbreviations etc. will not constitute errors. (For the “Record Classification Code” field, enter “RS” with the corresponding number entered by the submitter. For example: RS45.)

- B. New storage and refiles will be shelved, data entered with information received, and fully processed within 72 hours of receipt.
- C. The Contractor’s inventory control system will contain (at a minimum) the information listed under item I (herein), General Requirements.
- D. The Contractor will receive and process into their data system any updates to the database submitted by MCI. The Contractor will ensure that these changes have been incorporated into the data provided to MCI via monthly reports.
- E. The Contractor’s system will automatically calculate destruction review dates for all new storage, based on retention periods from MCI’s Record Retention Schedule, which will have been loaded into their system.
- F. MCI will provide the Contractor with a diskette containing any changes to MCI’s Record Retention Schedule, as soon as the change is adopted.

DESTRUCTION

Destruction of MCI records will be in accordance with industry standards. To include, or in addition to:

- A. Contractor shall not destroy or purge any MCI boxes or information without written approval from RIM. Only RIM has the authority to approve destruction of boxes or information contained in Contractor’s warehouse.
- B. The destruction sequence to include the following:
 - 1. Produce a Destruction Review Report listing all containers eligible for disposal. This report must be sorted by Record Classification Code. Submit to MCI by November 15.
 - 2. Upon receipt of the Destruction Review report back from MCI, any changes by MCI are entered and returned to MCI for final approval. MCI will return the final report with no remaining corrections to Iron Mountain to initiate the destruction.
 - 3. Report Unavailable Items to MCI. After identifying authorized containers from the Destruction Review report, generate a listing of containers that are unavailable for disposal because they are out on retrieval at the customer. MCI will use this report to research the retrieval and contact the MCI user for status.
 - 4. Verify that the containers pulled are those authorized on the Destruction Order (preferably utilizing bar code scanning).
 - 5. The Contractor will provide MCI a Destruction Certificate report after the completion of destruction. This report, signed by the Contractor, will list all the containers destroyed. It will include complete descriptive data for each container.